

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA  
CASE NO. 1:23-CV-21378-RUIZ/BECERRA**

CRAIG BUREY,

Plaintiff,

v.

NOMI HEALTH, INC., SBP STAFFING  
AND RECRUITING LLC, SB PORT  
VENTURES LLC, and TRIXIE BELO-  
OSAGIE,

Defendants.

**JOINT MOTION TO EXTEND THE DEADLINE TO FILE A JOINT SCHEDULING  
REPORT**

Plaintiff Craig Burey and Defendant Nomi Health, Inc., by and through undersigned counsel, hereby move this Court to extend the May 19, 2023 deadline set by the Court for filing a joint scheduling report (Dkt. 10), stating as follows:

1. Burey filed his Complaint on April 12, 2023 (Dkt. 1), which named Nomi Health, Inc., SBP Staffing and Recruiting LLC (“SBP Staffing”), SB Port Ventures LLC (“SB Port”), and Trixie Belo-Osagie as Defendants.

2. Burey served the Complaint on Nomi on April 14, 2023 (Dkt. 7), and Nomi filed its Answer on May 5, 2023 (Dkt. 8).

3. On May 8, 2023, this Court entered an order requiring submission of a joint scheduling report by May 19, 2023. (Dkt. 10.)

4. However, neither SBP Staffing, SB Port, nor Ms. Belo-Osagie have yet appeared in this case, nor are their respective responses to Burey’s Complaint due before May 19, 2023. Moreover, on May 11, 2023, the Court entered an order requiring SBP Staffing, SB Port, and Belo-

Osagie to file a joint response within the time allowed for the last-served Defendant to respond.  
(Dkt. 13.)

5. Thus, the Parties respectfully request that the deadline for submission of the joint planning report be extended to 14 days after SBP Staffing, SB Port, and Belo-Osagie file their response to the Complaint. The Parties respectfully submit that the requested extension would ensure that the currently absent Defendants will have input into the joint planning report.

6. In light of the foregoing, Burey and Nomi respectfully request that the deadline for the Parties to submit a joint planning report be extended up to and including 14 days after SBP Staffing, SB Port, and Belo-Osagie file their response to Burey's Complaint.

**CERTIFICATION OF PRE-FILING CONFERENCE**

In accordance with Local Rule 7.1(a)(3), counsel for Plaintiff Craig Burey and for Defendant Nomi Health, Inc. certify that they conferred on, and agree to, the relief sought in this motion. However, because Defendants SBP Staffing, SB Port, and Belo-Osagie have not yet appeared in this action, Burey and Nomi have not conferred with them concerning the motion.

Respectfully submitted this 17th day of May 2023.

/s/ Toussaint Cummings, Esq.

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*Attorney for Defendant Nomi Health, Inc.*

*Attorneys for Plaintiff Craig Burey*

**CERTIFICATE OF SERVICE**

I hereby certify that on May 17, 2023, the foregoing document was electronically filed with the Clerk of Court using the CM/ECF system, which will serve a copy of the same on all counsel of record.

/s/ Andrew M. McKinley  
Andrew M. McKinley